

1 J Christopher Jorgensen
Nevada Bar No. 5382
2 LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Pkwy, Suite 600
3 Las Vegas, NV 89169-5996
Tel: (702) 949-8200
4 Email: cjorgensen@lrrc.com

5 *Attorneys for Defendant AmeriCredit Corp./General*
6 *Motors Financial Company, Inc.*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 SHELLEY T. PADDOCK,

12 Plaintiff,

13 vs.

14 EXPERIAN INFORMATION
SOLUTIONS, INC., and
15 AMERICREDIT CORP./GENERAL
MOTORS FINANCIAL COMPANY,
16 INC., DOES I-V, individually; and ROE
CORPORATIONS VI-X, inclusive,

17 Defendant.
18

Case No.: 2:20-cv-02097-JCM-DJA

Compl. Filed: November 13, 2020

**STIPULATION TO EXTEND
DEFENDANT AMERICREDIT
CORP./GENERAL MOTORS
FINANCIAL COMPANY, INC.'S
TIME TO RESPOND TO
COMPLAINT**

(SECOND REQUEST)

19
20 This Stipulation to Extend defendant AmeriCredit Corp./General Motors
21 Financial Company, Inc.'s Time to Respond to Complaint is made by and between
22 Plaintiff Shelley T. Paddock ("Plaintiff") and Defendant AmeriCredit Corp./General
23 Motors Financial Company, Inc. ("AmeriCredit/GM") through their respective counsel,
24 in light of the following facts:

25 **RECITALS**

26 A. Plaintiff filed the Complaint ("Complaint") against Defendants on or
27 about November 13, 2020.
28

1 B. AmeriCredit/GM was served with the Complaint on or about November
2 18, 2020.

3 C. AmeriCredit/GM's initial deadline to respond to the Complaint was
4 December 9, 2020,

5 D. The parties agreed on December 7, 2020 that AmeriCredit/GM would
6 have through January 7, 2021, to respond to the Complaint in order to give
7 AmeriCredit/GM time to investigate Plaintiff's claims and prepare a proper response, and
8 for the parties to discuss a potential resolution of this matter ("First Stipulation"). Due to
9 a miscommunication/misunderstanding, the First Stipulation did not get filed with the
10 Court until December 14, 2020 (ECF No. 6).

11 E. This Court granted the First Stipulation on December 15, 2020 (ECF No.
12 8).

13 F. The parties have agreed that AmeriCredit/GM will have a second
14 extension through and until January 21, 2021, to respond to the Complaint ("Second
15 Stipulation) for the same reasons as to the First Stipulation.

16 G. There is good cause to grant this Second Stipulation because
17 AmeriCredit/GM requires additional time to investigate Plaintiff's claims and prepare a
18 proper response, and the parties require additional time to consider a resolution of this
19 matter.

20 H. This Second Stipulation is filed in good faith and not intended to cause
21 delay.

22 I. Pursuant to Local Rule IA 6-2 and Local Rule 7-1, Plaintiff and
23 AmeriCredit/GM respectfully request that the Court extend AmeriCredit/GM's time to
24 respond to Plaintiff's Complaint through January 21, 2021.

25 ...

26 ...

27 ...

28 ...

STIPULATION

NOW, THEREFORE, Plaintiff and AmeriCredit/GM hereby stipulate and agree that AmeriCredit/GM has up to and including January 21, 2021, to file a response to Plaintiff's Complaint.

IT IS SO STIPULATED.

DATED this 6th day of January, 2021

DATED this 6th day of January, 2021

KIND LAW

LEWIS ROCA ROTHGERBER CHRISTIE

By: /s/ Michael Kind
Michael Kind, Esq.
Nevada Bar No. 13903
8860 South Maryland Pkwy, Suite 106
Las Vegas, Nevada 89123
Attorneys for Plaintiff
Shelley T. Paddock

By: /s/ J Christopher Jorgensen
J Christopher Jorgensen, Esq.
Nevada Bar No. 5382
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169
Attorneys for Defendant AmeriCredit
Corp./General Motors Financial
Company, Inc.

ORDER

IT IS SO ORDERED.



United States Magistrate Judge

Dated: January 7, 2021

3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

Lewis Roca
ROTHGERBER CHRISTIE